

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE)	
)	
DEREK JEFFERS)	11-07514-FJO-13
Debtor)	

MOTION TO EXTEND THE STAY ON REAL ESTATE AND AUTOMOBILE

Comes now Derek Jeffers, as Debtor, by counsel, Everett Powell, and files this motion for an Extension on the Stay on real property located at 5934 Skyward Lane, Indianapolis, IN 46234 and on the 2004 Lincoln Town Car, and for this motion would show:

1. That on March 1, 2011, the above-named Debtor filed a petition for Chapter 13 of the Bankruptcy Code, it was subsequently dismissed.
2. On June 14, 2011, the Debtor re-filed his petition pursuant to Chapter 13 of the Bankruptcy Code.
3. That Debtor has taken actions to correct previous shortfall and is prepared to make payments to Secured Creditor in order to correct the delinquency.
4. That the debtor has equity in the property in question and the property is necessary for an effective reorganization.

WHEREFORE, Derek Jeffers prays the Court to extend the stay of Section 362 of the Bankruptcy Code on the property in question and for all other relief just and proper.

Respectfully submitted,

By /s/ Everett E. Powell II
Everett E. Powell II, 24658-49

CERTIFICATE OF SERVICE

The undersigned does hereby certify that the foregoing has been duly electronically noticed or mailed via United States mail, first class, on July 16, 2011 to the following:

Brooks J. Grainger
Attorney for Santander Consumer USA Inc.
PO Box 6200
South Bend, IN 46660

Beneficial Indiana Inc.
by PRA Receivables Management, LLC
PO Box 12907
Norfolk, VA 23541-0907

Robert A. Brothers, Trustee
151 N. Delaware St., Ste. 1400
Indianapolis, IN 46204

US Trustee
101 W. Ohio St.
Suite 1000
Indianapolis, IN 46204

/s/ Everett E. Powell II
Everett E. Powell II